

August 8, 2025

Response To Judge's Order, Docket #581, And Request To Permanently Seal Or Permanently Redact

Judge Liman,

I - Mario Armando Lavandeira, Jr., known professionally as Perez Hilton - write as a nonparty in *Lively v. Wayfarer Studios LLC* (1:24-cv-10049) in response to your order - docket #581, which I believe is aimed at me personally.

I respectfully inform this court that *Us Weekly* recently ran a headline that read "Blake Lively Slams Perez Hilton in Court for Calling Her 'Ku Klux Khaleesi', Says He's Not a Journalist".

I believe it is important for this court and counsel for both parties to see what this all has degraded into, hence citing the *Us Weekly* headline.

This case was supposed to be about *alleged* sexual harassment and an *alleged* smear campaign that began in August of 2024, according to the lawsuit Ms. Lively filed with this court in December of 2024.

I have extensively covered the *It Ends With Us* mess since the very beginning. Ms. Lively is almost 40 years old. Prior to her handling of matters in this case, she used to be very close friends with Taylor Swift, one of the people I most frequently talk about on my website and social channels. Ms. Lively's fans (and people who are aware of her) are my core audience. Mostly women of a certain age. The *Gossip Girl* viewer grown up.

OF COURSE I was going to go big in covering this all.

And, unfortunately for Ms. Lively, *no one* gave me any information regarding her or her glaringly unprofessional behavior towards the Wayfarer Defendants at any point in 2024. In fact, defendant Melissa Nathan called me irrelevant and insulted me in a text message to Justin Baldoni last year, which has been entered into evidence in this trial.

In 2024: NOT A SINGLE PERSON shared any information with me that I used in my reporting on this mess. Not a single email, not a single text or any other communication with a source exists from last year, when Ms. Lively claims this alleged smear campaign began - way back in August. (I am happy to put this all in a sworn declaration or affidavit.)

Ms. Lively has targeted over 107 creator-journalists with subpoenas, either directly or through the tech giants. This court thinks that's normal or appropriate? Thus far you have approved of that behavior.

Respectfully, I believe that is reprehensible - of Ms. Lively *and* you.

This court is now handling and making rulings on multiple first amendment issues that affect me and many others across the country. How you are deciding these things has serious and real consequences for the future of journalism.

I am a journalist. You or Ms. Lively may not like the kind of journalist I am. That doesn't take away the fact that I am a journalist. I do not like Sean Hannity, but he's a journalist. I do not like Donald Trump, who appointed you to this job, but I still acknowledge that he is the President Of The United States.

I am now honoring and will continue to honor this court's request going forward to refrain from clever nicknames in court filings, even though you have shown little care publicly for my request to help ensure the safety of my family.

I am shocked and beyond disappointed that you would not err on the side of caution with regards to a pro se movant. I am still hurt and OUTRAGED that you denied my simple request for a protective order to keep all of my personal information private. Ms. Lively and her lawyers had every ability to file redacted versions of the home addresses of nonparties, but they did not. And you allowed that reprehensible (in my opinion) behavior to take place on your docket. Time and time again. Repeatedly. For months.

I also had no reason to believe that the Lively legal team would honor this court's already established practices protecting confidentiality, as they have repeatedly been accused of leaking information to the press.

To that note of my family's safety, earlier this week I filed another Request To Permanently Seal or Permanently Redact the subpoena against me that Esra Hudson submitted to your court as evidence on August 6th. *Exhibit A of docket #565*.

I have not seen my request from this week on your docket yet and I am using this letter as *another* request to PERMANENTLY redact or seal my home address in that filing - and all previous and future filings. Automatically. Without me ever having to request that.

Also, for the sake of transparency, please correct me if I'm wrong. It is my understanding, representing myself here pro se - without an attorney, that you don't have any jurisdiction over me.

I am not a party to this lawsuit. I have zero connection to New York.

Inspired by the words of Ryan Reynolds, what are you going to do? Sanction me for hurt feelings?

I was dragged into this mess by Ms. Lively - unnecessarily.

Everything she is asking of me, she can get that from the Wayfarer Defendants. How she goes about that is up to her and her lawyers.

As a journalist, I know my rights. What Ms. Lively is asking of me is wrong. I will NOT give up my protected sources. I am willing to go to jail for that!

As someone who is watching this case daily, I am in strong disagreement with how you continue to handle it and I thank the court for - as you stated in your order today - giving me this opportunity to respectfully disagree.

I truly hope Ms. Lively is unafraid to litigate my subpoena in Nevada, the appropriate venue, because I respectfully share that it is my opinion that you may be strongly biased in favor of Ms. Lively and I may not be able to get a fair outcome in your court.

The court jester always spoke truth to power. The court jester is alive and well and his name is Perez Hilton.

Submitted,

/s/ Mario Armando Lavandeira, Jr.

Mario Armando Lavandeira, Jr.

aka Perez Hilton